

**PROPOSED SCHEDULE REGARDING MERITS EXPERT DISCOVERY,
DISPOSITIVE MOTIONS, AND CERTAIN EVIDENTIARY ISSUES**

Merits Expert Discovery or Dispositive Motion Briefing Issue	Defendants' and Class Plaintiffs' Proposed Deadline	DAPs' Proposed Deadline
Identification and Rule 26(a)(2)(B) and 26(a)(2)(C) disclosures for any Plaintiff expert who may testify at trial:	May 1, 2023	June 5, 2023
Identification and Rule 26(a)(2)(B) and 26(a)(2)(C) disclosures for any Defendant affirmative and/or rebuttal expert who may testify at trial:	October 30, 2023	November 30, 2023
Expert reports from Plaintiffs' experts rebutting Defendants' affirmative expert reports:	February 7, 2024	March 10, 2024
Dispositive motions and merits expert <i>Daubert</i> motions:	April 17, 2024	May 17, 2024
Responses to dispositive motions and merits expert <i>Daubert</i> motions:	July 16, 2024	August 16, 2024
Replies in support of dispositive motions and merits expert <i>Daubert</i> motions, and motions to exclude evidence on summary judgment, if any:	August 30, 2024	September 30, 2024

All parties agree about the following matters:

- Plaintiffs may depose Defendants' experts who serve affirmative or rebuttal reports, and Defendants may depose Plaintiffs' experts who serve affirmative or rebuttal reports.
- The parties' meet and confer regarding objections to authenticity or admissibility of exhibits filed in support of or in opposition to summary judgment must be concluded no more than 30 days after service of the respective summary judgment opposition briefs. Any exhibits not objected to by this deadline will be deemed

admissible for purposes of summary judgment only, without prejudice to challenging admissibility at trial.

- The parties will continue to meet and confer about the timing and process related to the authenticity and admissibility of potential trial exhibits. The parties will provide an update to the Court at the next status conference, currently proposed to be scheduled for December 15, 2022. *See* ECF No. 1542.